

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TPC Group Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10493 (CTG)

(Joint Administration Requested)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the attorneys listed below enter their appearances as counsel to an ad hoc group of holders of the 10.875% secured notes due 2024 and the 10.5% secured notes due 2024 (the “**Ad Hoc Noteholder Group**”), pursuant to sections 342 and 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”), and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and request that all notices given or required to be given in these chapter 11 cases (collectively, the “**Chapter 11 Cases**”), and all papers served or required to be served in the Chapter 11 Cases, be given and served upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand is not only for the notices and papers referred to in the sections of the Bankruptcy Code and the Bankruptcy Rules

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor’s corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

specified above, but also includes, without limitation, any and all orders and notices of any application, motion, petition, complaint, demand, request or other pleading in the Chapter 11 Cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically or otherwise filed with or delivered to the Bankruptcy Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001), which affects the Debtors, or property of the Debtors, or the Ad Hoc Noteholder Group.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance, nor any later appearances, pleadings, proofs of claim, claims or suits filed in the Chapter 11 Cases, shall be deemed or construed as a waiver of: (i) any rights of the Ad Hoc Noteholder Group to (a) have final orders in any non-core matters entered only after de novo review by a District Judge, (b) trial by jury in any proceeding so triable in the Chapter 11 Cases or any case, controversy, or proceeding related to the Chapter 11 Cases, or (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (ii) any other rights (including setoff and recoupment), claims, actions, and defenses of the Ad Hoc Noteholder Group either in law or in equity, under any agreements or otherwise, all of which rights, claims, actions, and defenses are expressly reserved.

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Dated: June 1, 2022
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Matthew B. Lunn

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